

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of New York

Alexis A. Figuereo

Plaintiff

v.

The City of Saratoga Springs, et al.

Defendant

Civil Action No. 1:23-cv-00922-AMN-PJE

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Managing Attorney's Office
New York State Office of the Attorney General

(Name of person to whom this subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attached Addendum

Place: FitzGerald Morris Baker Firth, P.C.
68 Warren Street
Glens Falls, NY 12801

Date and Time:

05/24/2025 10:00 am

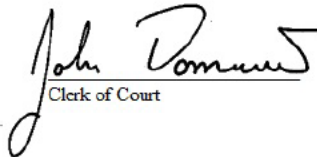
☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 4/28/2025


Clerk of Court




Paul J. Evangelista
U.S. Magistrate Judge

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Shane L. Crooks and John T. Catone, who issues or requests this subpoena, are: John D. Aspland, Jr., Esq., FitzGerald Morris Baker Firth, P.C., 68 Warren Street, Glens Falls, NY 12801; Email: jda@fmbf-law.com; Tel.: (518) 745-1400.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ADDENDUM

True and accurate, legible copies of any and all drafts of the New York State Office of the Attorney General's (hereinafter, "OAG") Report, dated February 20, 2024 and entitled, "A Report on the Saratoga Springs Police Department's Response to Protests in 2021" (hereinafter, "Report").

True and accurate, legible copies of any and all documents, records, photographs, video footage, audio files, statistics and/or other data, power points and/or materials referenced in the Report and/or reviewed, utilized and/or relied upon by the OAG and/or its officers, employees, members, agents, servants and/or designees in the preparation of the Report and/or reviewed, utilized and/or relied upon by the OAG and/or its officers, employees, members, agents, servants and/or designees to reach any factual conclusions contained in the Report, including, but not limited to, the "approximately 276,809 documents" referenced on page numbered "1" of the Report.

True and accurate, legible copies of any and all statements, sworn or otherwise, and transcripts of any and all interviews, oral examinations and/or depositions taken and/or conducted by and/or at the behest of the OAG and/or its officers, employees, members, agents, servants and/or designees as part of any investigation conducted with respect to the subject matter of the Report and/or the events memorialized therein, including, but not limited to, the "9 sworn oral examinations" taken and "interview[s of] members of the public" as referenced on page numbered "1" of the Report, together with any and all notes, memoranda and/or other written and/or typed materials prepared and/or generated by and/or at the behest of the OAG and/or its officers, employees, members, agents, servants and/or designees at any time with respect to the same.

True and accurate, legible copies of any and all written correspondence, including emails and text messages, and/or notes, transcripts and/or other memorializations of any oral communications between the OAG and/or its officers, employees, members, agents, servants and/or designees and any person(s) interviewed, deposed and/or orally examined by OAG and/or its officers, employees, members, agents, servants and/or designees as part of any investigation conducted by and/or at the best of the OAG with respect to the subject matter of the Report and/or the events memorialized therein.

True and accurate, legible copies of any and all documents, records and/or other materials received by the OAG and/or its officers, employees, members, agents, servants and/or designees from the City of Saratoga, its Police Department and/or employees thereof as part of any investigation conducted by or at the behest of the OAG with respect to the subject matter of the Report and/or the events memorialized therein.

True and accurate, legible copies of any and all records, documents and/or other materials in the possession of the OAG concerning, pertaining to and/or relating to any of the following persons: John F. Safford; Meg Kelly; Tim Coll; Robin Dalton; James Montagnino; Tyler McIntosh; Shane L. Crooks; John T. Catone; Robert Jillson; Timothy Sicko; Andrew Streim; Paul Veitch; Megan Davenport; John Guzek; Matthew Miller; William Coyner; Yevgeniy Khutoryanskiy; and Michael Zurlo.

True and accurate, legible copies of any and all subpoenas issued as part of any investigation conducted by and/or at the best of the OAG with respect to the subject matter of the Report and/or the events memorialized therein, together with true and accurate, legible copies of any records, documents and/or other materials produced and/or received in response to any such subpoenas.

True and accurate, legible copies of any and all written correspondence, including emails and text messages, and/or notes, transcripts and/or other memorializations of any oral communications between the OAG and/or its officers, employees, members, agents, servants and/or designees and any persons referenced and/or identified in the Report.

A list of any and all witnesses to and/or having any information regarding any of the subject matter of the Report and/or the events memorialized therein, whether interviewed or not.

True and accurate, legible copies of any and all communications between the OAG and/or its officers, employees, members, agents, servants and/or designees and Alexis A. Figuereo, Alexis Brown, Molly B. Dunn, Gabrielle C. Elliott, Marcus Filien, Chandler M. Hickenbottom, Samira K. Sangare, Tiemogo J. Sangare, Jamaica Miles and/or any officers, members and/or representatives of Saratoga Black Lives Matter, Inc. and/or their respective attorneys.

True and accurate, legible copies of any and all communications between the OAG and/or its officers, employees, members, agents, servants and/or designees and the City Court of the City of Saratoga Springs with respect to Jamaica Miles.

True and accurate, legible copies of any and all communications between the OAG and/or its officers, employees, members, agents, servants and/or designees and the County Court of the County of Saratoga with respect to Jamaica Miles.